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June 28, 2013

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: GN Docket No. 12-268: Expanding the Economic and Innovation  
Opportunities of Spectrum Through Incentive Auctions

Dear Ms. Dortch:

On June 26<sup>th</sup>, I met with Bill Lake, Media Bureau Chief, Barbara Kreisman, Video Division Chief, Gary Epstein, Incentive Auction Task Force, and 2 additional staff, to discuss the formation of the LPTV Spectrum Rights Coalition, and the over 230 FCC broadcast television licenses we are providing guidance to in 25 states. There is an attached PDF of our presentation.

What we learned from the discussion following the presentation was that the Coalition needs to reply to the NPRM and the very specific LPTV-related questions

it is asking for comments, that is, the rules of how to conduct the post-auction repack of the LPTV and TX stations. The Coalition determined that many items it wants changed in the repack process need to be through legislation and not administrative rule changes.

We also discussed the need for better numbers to understand what would be happening with the 6400+ LPTV/TX licensees during the repack. We also discussed how would the current rules apply to the broadband builders who have received a tremendous amount of construction permits. We further discussed the potentially business-ending mandate to have to “double-build” the station, in regards to those licensees who might have to complete the build-out of a CP and within a few years have to rebuild on a lower channel. This will be a major component of the NPRM submission.

I also requested that the LTPV/TX licensees have their own LEARN session so that they could understand what would be going on in the repack and when. But FCC staff present did not think a special educational session was needed. The Coalition advised the Auction staff that it would conduct its own outreach to the LTPV/TX community, and would continue to provide its research to the FCC.

Respectfully submitted,

Mike Gravino  
LPTV Spectrum Rights Coalition  
Director